

**BRAFMAN & ASSOCIATES, P.C.**

ATTORNEYS AT LAW

767 THIRD AVENUE, 26TH FLOOR

NEW YORK, NEW YORK 10017

TELEPHONE: (212) 750-7800

FACSIMILE: (212) 750-3906

E-MAIL: BBRAFMAN@BRAFLAW.COM

BENJAMIN BRAFMAN

ANDREA ZELLAN

JOSHUA D. KIRSHNER

JACOB KAPLAN

ALEX SPIRO

MARK M. BAKER  
OF COUNSEL

MARC AGNIFILO  
OF COUNSEL  
ADMITTED IN N.Y. AND N.J.

June 14, 2016

**VIA ECF**

The Honorable Anne E. Thompson  
United States District Judge  
District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: United States v. Allen Pollak, 15 Cr. 476 (AET)

Dear Judge Thompson:

As part of his bail conditions, Allen Pollak surrendered his passport to Pretrial Services and had his travel restricted to the Continental United States. I write now on his behalf to respectfully request that this Court modify Mr. Pollak's travel restrictions to allow him to travel for a five-day trip to Montreal and Toronto, Canada, in order to attend work-related educational consulting conferences. Specifically, Mr. Pollak would leave New Jersey on Monday, June 20, 2016, and return on Friday, June 24, 2016. I also respectfully request that this Court direct Pretrial Services to return Mr. Pollak's passport for the duration of the trip.

I have spoken with AUSA Zach Intrater and Pretrial Services Officer Wendy Lonsdorf about Mr. Pollak's need to modify his bail conditions; both have no objection to this Court granting the request. The precise address where Mr. Pollak will be staying in Canada will be provided to Pretrial Services in advance of his trip. I have agreed with Pretrial Services that we will return Allen Pollak's passport to their office by Tuesday, June 28, 2016.

As a courtesy to the Court, I have attached a proposed Order addressing the requested modification.

Thank you for your consideration.

Sincerely,

  
Marc Agnifilo

cc: AUSA Zach Intrater (via ECF)  
Pretrial Officer Wendy Lonsdorf (via email)

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

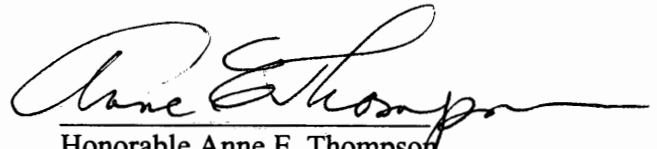
ALLEN POLLAK

15 Cr 476 (AET)

**ORDER**

Based on the attached letter from Marc Agnifilo (counsel for Allen Pollak) dated June 14, 2016, and with no objection from the Government (Zach Intrater, appearing) and for other good cause shown, it is hereby ORDERED that Allen Pollack's bail conditions are modified to the extent that Mr. Pollak may travel to Montreal and Toronto, Canada, from Monday, June 20, 2016, until Friday, June 24, 2016. Additionally, Pretrial Services is authorized to return Mr. Pollak's U.S. passport for the duration of the trip, with Mr. Pollak being required to return his passport to Pretrial Services by Tuesday, June 28, 2016.

Dated: June 17, 2016  
Trenton, NJ

  
Honorable Anne E. Thompson  
United States District Judge